



**A06-0043 02-18-03**

*Application Form*

Carthage, Texas Oriented Strand Board

Name of facility\*

Louisiana-Pacific Corporation

Name of parent company (if any)

1199 County Road 201

Street address

Street address (continued)

Carthage, TX 75633

City/State/Zip code

Give us information about your contact person for the National Environmental Performance Track Program.

Name Mr./Mrs./Ms./Dr. Mr. Daria Partovi; Ms. Shannon Tocchini

Title Plant Environmental Manager

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Facility/Company Website www.lpcorp.com

\* If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- ♦ Provide background information on your facility.

# Section A

*Tell us about your facility.*

***I*** What do you do or make at your facility?

The Louisiana-Pacific Oriented Strand Board (OSB) manufacturing in Carthage, Texas produces OSB from locally harvested southern pine. OSB is an environmentally friendly alternative to plywood. It uses smaller diameter trees such as trees from tree farms and scrub trees from land clearing and eliminates the need to cut old growth forest. The Carthage OSB Plant normally operates on a continuous basis (24 hours per day, 7 days per week). The maximum annual production of the OSB Plant is currently limited by permit to 597,230,000 square feet of OSB on a 3/8-inch basis. The daily process throughput is approximately 1,636,250 square feet on a finished 3/8-inch product.

**The OSB Manufacturing Process**

Tree-length logs are delivered to the plant site, transferred to the log storage area, and stored until needed. The logs are transferred from the storage area to debarkers where the bark is removed. After this process, waferizers reduce the logs into thin wafers. These wafers are transported to large storage bins. From the storage bins, the wafers are routed to one of four dryers where they are dried to the desired moisture content.

Wafers exiting each dryer are collected by a cyclone and then pass to a screen that separates the large wafers from the fines. Large wafers from screen process are transported to either the core dry storage bin (middle layer) or to one of the two surface dry storage bins (face layer), and all fines are used as fuel for the dryer burners.

From their respective dry bins, wafers are routed to either the core or the face blender where they are blended with resins & wax. The coated wafers will then pass to the forming line and are assembled into a mat consisting of a core layer between two face layers. The loosely assembled mat is then pressed into OSB panels.

The pressed panels are conveyed to edge trim and cross cut saws where they are cut to proper size. Some of the boards

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proceed either to the Tongue-and-groove or TechShield process. The sheeting is stacked, and then the edges of the stacks are coated with a polymeric and water-resistant seal. The company logo is applied to the side of each stack unit. The finished panels are stored in a warehouse for shipment.

LP's Carthage facility also produces a value-added product, called TechShield radiant barrier sheathing, a structural panel product that is designed to save energy and keep homes cooler. Louisiana-Pacific Corp. is a premier supplier of building materials, high-quality commodity and specialty products to its rapidly growing retail, wholesale, homebuilding and industrial customers.

NAICS

321219      \_\_\_\_\_

2 List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

5 Complete the Environmental Requirements Checklist on pages 32-38 of the instructions and enclose it with your application.

- 6 Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level?

LP Carthage participated in the EPA's WasteWise program as part of LP Corporation. Foresters at the local facility provide educational programs and presentations for local college and high school students on sustainable forestry. Our nearby tree nursery donates thousands of trees annually to the National Tree Trust. Many employees also participate in and/or the facility contributes to Junior Achievement, Habitat for Humanity, Panola Development Foundation, Sustainable Forestry Initiative, Panola College Scholarship, and Carthage Education Foundation. More community involvement and outreach information is provided in Section D of this application.

Below is the story of EMS implementation at the LP Carthage facility:

**CARTHAGE BUILDS AN EMS FROM THE GROUND UP**  
One of the company's newest OSB plants, LP's Carthage, Texas Oriented Strand Board mill began operation in 1998. Led by Environmental Manager Daria Partovi, the EMS team was formed with the new operation from the ground up.

Starting with a group of skeptical volunteers with no environmental background or training, over the course of one year Daria built a highly effective Environmental Management System. The EMS team not only wrote comprehensive standard operating procedures for every aspect of the plant's environmental management, but also engaged employees throughout the facility in actively managing the environment.

To keep EMS alive at Carthage over the years, meetings are held unfailingly once a month, and a disciplined process is in place to regularly update SOPs, always with the involvement of employees. People rotate through the 8-member team: so far, over 24 people have served on the EMS team. In addition, environmental messages are consistently reinforced through a series of innovative "posters" throughout the plant. The results: Carthage achieves consistently clean audits, and has not had one NOV since it started up.

Here is Daria's story:

**Recruiting the Team**

When I first came to Carthage, it was the year of the construction. We had hired crew at the new plant, but had not yet started production. Our EMS started with posters in the plant inviting employees to join the team. Even though nobody really knew what an EMS team was, 18 people signed up for that first team. They came from all over the plant: utility crew, sweeping, all the way to waferizer operator, shipping, and receivables.

At the first meeting, I explained to the team that the expectation was they would put a program together covering all the environmental compliance issues in the facility – waste, water, and air. Their reaction was: “You are the manager of environmental. Why do you want us to do this? We have no idea how to do this.”

I told them, “I need your help. I’m going to train each and every one of you on environmental regulations. You won’t get any pay or extra bonus by volunteering. But the knowledge you’re going to gain is something that will maybe give you an edge on your next employment..” All agreed that they still they wanted to become EMS team members. At first, the incentive was just the opportunity to learn.

We started with five hours training about regulation on solid waste. The first thing I asked them to do was go out to their stations and write down what type of waste they were generating. Everything: the can of Coke in their hand, the paper they were writing on, the chemicals they were using, the clean -up materials, the equipment to clean up. Everything they touched -- chemicals, oil, dust, plastic.

At the next meeting, they brought in their lists, which I put into five categories: municipal waste, hazardous waste, non-hazardous waste, recyclable material, and universal waste. Then the team went out and wrote down where we currently put the waste, and their suggestions for the best location to put it. Because the plant had not yet started operation at that time, we were storing things in one corner of the plant. I used the team’s input to help figure out what we needed to have for start-up of the plant. It included numbers and placement of dumpsters, hoppers, 55 gallons drums, and red colored drums to collect aerosol cans.

Remember, none of these people were working for me – they all had things they had to do on their jobs. But on their time off, or extra 15 minutes for break, they started writing these things down for the EMS team.

#### Writing SOPs

Then we start talking to team members about who would be responsible for which SOP. The SOP (Standard Operating Procedure) is at the heart of our EMS. We came up with 44 SOPs on solid waste. They wrote the SOPs, then I typed every one up, because their job wasn’t typing - they had other jobs to do. Then I showed it to them, they read it and reapproved it. Team members were really proud that they had written their own SOP, saying “Did I write that?” We used this process to write all those SOPS on solid waste and the plant managers signed them.

We then moved on to second part of the EMS book, the wastewater module. We used the same process with the same team and created 14 wastewater SOPs, finished within a month or so.

The team continued to move on to the third, most difficult, module, the air module. First, everyone was very well trained on general requirements of our permits, what we have to do to comply, and so on. Once again, using the same process, the team wrote 24 SOPs. The air module took a long time because it was so complicated. We finished it in 1999.

When our plant's EMS book was finished, the entire plant celebrated. Each EMS team member received a hand-made bone-handle knife, presented personally by the plant manager. It was a very happy group.

This was how we started EMS at Carthage. It was a long process, but we had a great team. It was a lot of hard work, and we had to correct lots of SOPs. But it pays off. When EPA or other regulatory agencies look at my SOPs and check them, everything is exactly as the permit says.

#### *Keeping EMS Alive and Well*

We have done a lot to keep EMS alive. At the beginning, day-by-day, the original EMS team members went out and talked to people about environmental management. People started getting interested. The team has 8 members, and people come and go. So far, over 24 people have served on the EMS team. Through the years we developed the EMS meetings; we have one EMS meeting every month religiously and have never missed one of them. If I notice one or two members not coming, I politely ask them to leave because other people want to join. A key to the success of our meeting is plant manager participation. Plant managers participate in EMS team meetings, and shift supervisors' performance plan includes participation four times per year. When team members see that the shift supervisor is also in the EMS team meeting, along with the plant manager, they know environmental management and the EMS is important.

One of the most important jobs of the EMS team is to keep SOPs up to date. We have a regular process for doing that. Every meeting, we review six SOPs from the beginning, and update any that need it. This way, we move through all 72 SOPs a few times a year. Also, when we change any process in the plant we have a process change sheet that starts all of us thinking about what we need to do. We may need a new environmental SOP, or we may need to change a chemical. As a team, we decide and sign the process change sheet and present it to the plant manager. That's the bible.

Every year we train everybody in the plant on these SOPs. We have an eight hour crew meeting every quarter to train all facility employees. I do all my environmental training in this quarterly crew meeting. During that crew meeting I can catch everybody up on EMS SOPs. The environmental portion of these crew meetings is as much as 3 hours. All employees at the facility receive at least 5 hours per year of environmental training in these sessions. Additional employee training is provided through new hire orientation, job specific training, and monthly supervisor training on environmental SOPs.

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At Carthage, one of the things I think we do that makes our EMS successful is the posters we do. Three or four years ago, I started doing small posters with EMS messages, and hanging it on the walls all around the plant. I change it continuously -- every 2 or 3 weeks 2 or 3 weeks I put up different messages. These are simple colorful posters with messages like "Remember aerosol cans are explosive;" "There are red drums everywhere to collect cans," "Scrap metal dumpster is only for scrap metal!"

#### RESULTS AND BENEFITS

When we have environmental compliance internal auditing, state auditing, no NOVS at all. Our place is clean as a whistle. We are exceeding expectations. Now when the state auditors come in, they come by 10am and leave by lunchtime. They know by looking at the plant that they are not going to find problems. They see everything is labeled, and SOPs are in place. They say: "This is the first time we've seen all these procedures so extensively documented."

The team is really good right now. I'm really proud we are getting to do something positive. The positive part of it is each person comes to the meeting with lots of problems -- and some of these problems are not environmental. Because of the knowledge that they have gained -- they come up with other ideas, and we pass them on to the appropriate people and follow up. Some can't be done; some will be done. But they are very proud that their voice gets somewhere.

What would I tell someone considering implementing an EMS program? I would say that if they do it right, EMS would work for them, because they don't need to worry about the plant. I'm the only environmental person here, but having an EMS is like having about 12 extra environmental people on staff. I can't be every place in the 50 acres of the plant at all times. The beauty of EMS is that I don't have to be there. Everyone knows what to do -- they can read it right there in their SOP. Each one of the people in the plant is an environmental manager in their own way.

# Section B

*Tell us about your EMS.*

have had a third-party assessment of your EMS.

Read the EMS requirements on page 9-12 of instructions.  
Tell us if your EMS meets these requirements for:

- 1 Environmental policy \_\_\_\_\_ ☒ Yes ☐ No
- 2 Planning \_\_\_\_\_ ☒ Yes ☐ No
- 3 Implementing and operation \_\_\_\_\_ ☒ Yes ☐ No
- 4 Checking and corrective action \_\_\_\_\_ ☒ Yes ☐ No
- 5 Management review \_\_\_\_\_ ☒ Yes ☐ No
- 6 Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?) ☒ Yes ☐ No
- 7 Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?) ☒ Yes ☐ No
- 8 When did you last update your aspect analysis? (mo/yr) 10/2002 (plus ongoing analysis via EMS team)
- 9 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes ☐ No
- 10 Did this cycle include both an EMS and a compliance audit? ☒ Yes ☐ No
- 11 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes ☐ No



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If yes, what method of EMS assessment did you use?

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Self-assessment

Third-party assessment

☐ GEMI

☐ ISO 14001 Certification

☐ CEMP

☐ Other

☒ Other Internal Audit /  
EMS On-Target Program;  
Spot checks; EMS Self  
Assessment

**Why do we need this information?**

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

**What do you need to do?**

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

# Section C

*Tell us about your past achievements and future commitments.*

**Part 1** You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions. Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

**Note to small facilities:** If you are a small facility, you must report past achievements for only one environmental aspect.

**First achievement**

<b>1</b> What aspect have you selected from the Table on page 29-31?	Water Use / Waste Water (Reduction)	
<b>2</b> What units are you using to quantify this aspect? (See Table, page 29-31.)	Gallons	
	PAST	CURRENT
<b>3</b> List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	9.1 million gallons of city water used	8.7 million gallons of city water used 405,000 gallons of water recycled per year (from projects listed below)
<b>4</b> What are the years for which you are reporting these quantities?	1999	2001
<b>5</b> Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.07	1.0
<b>6</b> What is your normalizing factor based on (e.g., production, employment)?	Production	

<p>7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?</p>	<p>The EMS team evaluated different sources of wastewater being generated at the facility. The team identified three items: air compressor condensate, Regenerative Thermal Oxidizer (RTO) dryer condensate, and floor mop water, that could be recycled into the process, reducing process water demands and recycling water generated from other parts of the process. Between these three sources approximately 1100 gallons of water is recycled per day by adding the water to the Wet Electrostatic Precipitator (WESP). The WESP uses approximately 25,000 gallons of water per day, so the savings in water use is approximately 5%. In addition, wastewater from the WESP is also recycled into the process by recycling 8000 gallons of water into the wet bins. Recycling of water from the air compressors, dryer RTO condensate, and floor mop reduces wastewater generated at the facility by an estimated 405,000 gallons per year. This amount offsets the total water used in the WESP by the same amount. Recycling of WESP water into wet bins reduces wastewater generation by more than 2.5 million gallons per year (only the condensate from the two sources and the mop water are included in the performance numbers for this achievement).</p>
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**Second achievement**

<b>1</b> What aspect have you selected from the Table on page 29-31?	Total Solid Waste	
<b>2</b> What units are you using to quantify this aspect? (See Table, page 29-31.)	Pounds	
	PAST	CURRENT
<b>3</b> List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	3,220,000 lbs	2,480,000 lbs
<b>4</b> What are the years for which you are reporting these quantities?	1999	2001
<b>5</b> Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	1.07	1.0
<b>6</b> What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b> You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	These improvements were achieved through an evaluation of waste streams performed by the Plant Environmental Manager and EMS team and education and awareness training related to waste management and reduction for all facility employees. Through these efforts and the raised awareness of all employees, we identified several areas where we could improve practices and performance and updated our standard operating procedures to reflect these improvements resulting in a significant improvement in recycling and reduction in solid waste generation going to landfill.	

**Part 2** You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using

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the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

**Note to small facilities:** If you are a small facility, you must report future commitments for only two environmental aspects.

## Section C, continued

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### First commitment

<b>1</b>	What aspect have you selected from the Table on pages 29-31?	Air Emissions /NOx Generation (reduction);	
<b>2</b>	What units are you using to quantify this aspect?	tons (NOx);	
<b>3a</b>	Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b>	If no, please explain why you believe this aspect should be included as a performance commitment.	N/A	
		CURRENT	FUTURE
<b>4</b>	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	NOx = 124.12 tons	Reduce NOx to 104.12 tons (by 20 tons/yr)
<b>5</b>	What are the years for which you are reporting these quantities?	2001	2005
<b>6a</b>	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
<b>6b</b>	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b>	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We plan to achieve this improvement by working with EPA and the State of Texas to reduce operating temperature requirements for our Regenerative Thermal Oxidizer (RTO) while maintaining an acceptable range of VOC reduction, or alternatively convert the unit to a Regenerative Catalytic Oxidizer (RCO), or by making some other energy efficiency improvement (including upgrading dryer burners to improve efficiency, reduce gas usage and reduce NOx emissions).	
<b>8a</b>	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>8b</b>	If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	RTO operating temperature requirements are outlined in our federally enforceable Title V Permit. This commitment would maintain VOC controls while significantly reducing energy use and NOx generation by the RTO unit.	

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**Section C, continued****Second commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Energy Use Reduction (reduction in natural gas usage)	
<b>2</b> What units are you using to quantify this aspect?	SCF (natural gas)	
<b>3a</b> Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.	N/A	
	CURRENT	FUTURE
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	Natural Gas = 213,676,816 SCF	Reduce energy used (produced by natural gas) to 204,276,816 (by 9.4 million SCF)
<b>5</b> What are the years for which you are reporting these quantities?	2001	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	We plan to achieve this improvement by working with EPA and the State of Texas to reduce operating temperature requirements for our Regenerative Thermal Oxidizer (RTO) while maintaining an acceptable range of VOC reduction, or alternatively convert the unit to an Regenerative Catalytic Oxidizer (RCO), or by making some other energy efficiency improvement (including upgrading dryer burners to improve efficiency, reduce gas usage and reduce NOx emissions).	
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds	RTO operating temperature requirements are outlined in our federally enforceable Title V Permit. This commitment would maintain VOC controls while significantly reducing energy use and NOx generation by the RTO unit.	



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requirements.	
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**Third commitment**

<b>1</b>	What aspect have you selected from the Table on pages 29-31?	Energy Use (reduction in purchased electrical energy use)	
<b>2</b>	What units are you using to quantify this aspect?	KwH	
<b>3a</b>	Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b>	If no, please explain why you believe this aspect should be included as a performance commitment.	N/A	
		CURRENT	FUTURE
<b>4</b>	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	45,516,320 KwH	Reduce energy use (purchased electric) to 45,066,320 KwH (by 450,000 KwH per year)
<b>5</b>	What are the years for which you are reporting these quantities?	2001	2005
<b>6a</b>	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
<b>6b</b>	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b>	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<p>The basic idea is to install timers that shut down equipment when it is not in use, but still running and using energy. Two of the projects to be implemented:</p> <p>1) Because the process of the T&amp;G (tongue and groove) line utilizes one sander head, the CP006 sanderdust baghouse will be isolated from the line, in turn resulting in a minimum power savings of \$5,000 per year.</p> <p>2) A timer will be installed in the PLC (Programmable Logic Control) to shut down the regrind hammermill, which delivers fuel from the metering bin into the Thermal Oil Heater (TOH) primary burner, to shut down the TOH baghouse and all related equipment when the TOH is operating on the natural gas burner. Results should be a minimum power savings of \$12,000 per year, plus savings on wear and tear for equipment.</p> <p>The same kinds of ideas can be applied to many other processes and equipment throughout the production line. We will continue investigating other areas (note: this commitment and environmental improvement was contributed by an active EMS team member).</p>	

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<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	N/A

**Fourth commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Total Waste Generation	
<b>2</b> What units are you using to quantify this aspect?	Pounds	
<b>3a</b> Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.		
	CURRENT	FUTURE
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	2,480,000 lbs	Reduce to 2,230,000 lbs (250,000 lbs reduction in waste going to disposal over the next 3 years)
<b>5</b> What are the years for which you are reporting these quantities?	2001	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	This reduction will be achieved by continuing awareness campaigns, soliciting input from employees, waste stream audits and evaluation by EMS team, and targeted reductions in significant areas, such as wood waste generation, including source reduction, energy recovery and finding new opportunities for materials recycling, reuse and resale.	
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	N/A	

**Section C, continued**

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**Fifth commitment**

<b>1</b> What aspect have you selected from the Table on pages 29-31?	Product Performance - expected lifetime energy use (offset) of product	
<b>2</b> What units are you using to quantify this aspect?	Kilowatts (estimated average lifetime household energy savings based on units of production);	
<b>3a</b> Is this aspect considered significant in your EMS?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>3b</b> If no, please explain why you believe this aspect should be included as a performance commitment.	This goal is an excellent example of improving the energy efficiency and environmental performance of products produced in this manufacturing facility that will result in a significant positive environmental impact beyond the facility's fence line. This goal could potentially have the greatest positive environmental impact of all of the goals due to the long use phase of the product and enormous potential for widespread use in new construction as well as remodel projects of all sizes.	
	<b>CURRENT</b>	<b>FUTURE</b>
<b>4</b> List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	1.7 billion kilowatts estimated savings over lifetime use of product (based on production volume in 2002)	3.5 billion kilowatts estimated savings over lifetime use of product (based on projected production volume in 2005)
<b>5</b> What are the years for which you are reporting these quantities?	2002	2005
<b>6a</b> (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	
<b>6b</b> (Optional) What is your normalizing factor based on (e.g., production, employment)?	% of TechShield Production compared to total production	
<b>7</b> You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<p>7% of total production was TechShield in 2001. By increasing the % of TechShield production (and therefore sales) of the TechShield product (compared to total production of all products produced at the facility), the company will improve energy efficiencies in the "use" phase of the product's life. We estimate that the % of TechShield that is produced will increase by 200% by 2005 as compared to 2002 production numbers. This will in turn increase the sum of long-term environmental benefits of the most environmentally friendly product.</p> <p>Here's how TechShield works: when radiant energy from the sun strikes the surface of the roof, it heats up. The heat radiates into the attic where it is conducted through the attic floor into the living areas. Air conditioning ductwork in the attic is also heated, further decreasing cooling efficiency. TechShield Radiant Barrier Sheathing prevents up to 97% of the sun's</p>	

	<p>radiant energy from entering the attic, leaving attic temperatures up to 30° cooler. Living areas and air conditioning ductwork stay cooler so less energy is required to maintain homeowner comfort.</p> <p>The energy offsets will be measured by number of panels produced compared to overall production and factored by the estimated average energy savings of a households in key target markets using these products versus traditional construction.</p> <p>To make this estimation, we are using information gathered from an in-house study of performance of the product and relating it to performance based on findings from similar studies in key target markets for the product.</p>
<b>8a</b> Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>8b</b> If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	N/A

**Why do we need this information?**

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

**What do you need to do?**

- ♦ Describe your approach to public outreach.
- ♦ List three references who are familiar with your facility.

# Section D

*Tell us about your public outreach and reporting.*

**1** How do you identify and respond to community concerns?

Facility managers and employees are involved in several community organizations including Chamber of Commerce, Panola Development Foundation, Junior Achievement, Sustainable Forestry, Local Emergency Planning Committee (LEPC), etc. The company also maintains a call-in number (LP Confidential Reporting Line) for employees, contractors and others to call and express concerns of any kind, including environmental concerns. These numbers are posted in various areas of the facility. The Carthage location also identifies and responds to community concerns via telephone, newspaper, advertisements, and mail. In addition, LP posts environmental information and performance on our corporate worldwide web-site ([www.lpcorp.com](http://www.lpcorp.com)). The company has provided facility tours to many groups, including college students, chamber of commerce, loggers, and other

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Expiration Date:

associations. Finally, we held an open house (community day) to invite the community to learn more about our operations and have the opportunity to ask questions or express concerns. We are exploring other opportunities to provide a forum for community information and concerns.

- 2 How do you inform community members of important matters that affect them?

We keep community members informed of important matters that may affect them through involvement in various community organizations as well as newspaper and internet communications. We are exploring other opportunities to provide forums for community information and concerns, for example, a community advisory council similar to those LP has established at some other facilities. We have found these to be a highly effective means for communicating with local communities.

- 3 How will you make the Performance Track Annual Performance Report available to the public?

☒ Website [www.LPCorp.com](http://www.LPCorp.com)

☒ Newspaper

☒ Open Houses

☒ Other

Local Library (Newspaper to provide announcement/availability of report)

**Section D, continued***Expiration Date:*

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

- 5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Chamber of Commerce	Tommie Ritter	903-693-6634
<i>State/tribal/local regulator</i>	TCEQ - Tyler, Region 5 - Environmental Investigator	Randall Gray	903-535-5100
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	City of Carthage Fire Marshall	Bryan Rickert	903-693-3211



# Section E

## Application and Participation Statement.

On behalf of LP Carthage Texas OSB  
[my facility],

I certify that

I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, including the Environmental Requirements Checklist. The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable Federal, State, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all Federal, State, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable Federal, State, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title

Mr./Mrs./Ms./Dr. Don Roark, Plant Manager

Phone Number/E-mail

903-694-2414; Don Roark@LPCorp.com

Facility Name

Louisiana-Pacific Corporation, Carthage, Texas, OSB Plant

Facility Street Address

1199 County Road 201

City/State/Zip Code

Carthage, TX 75633

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## Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

## *Environmental Requirements Checklist*

Use the Environmental Requirements Checklist to answer Question 5 in *Section A, Tell us about your facility*. This Checklist will help you identify the *major* Federal, State, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

Fill in your facility information below and enclose the completed Checklist with your application.

**Air Pollution Regulations**

*Check all that apply*

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☒ 5. Process Industry Emission Standards
- ☒ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☒ 8. Sampling, Testing, and Reporting
- ☒ 9. Visible Emissions Standards
- ☒ 10. Control of Fugitive Dust
- ☒ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

*Other (you must list these if applicable)*

- ☐ 13. Federal, State, tribal, or local regulations not listed above.
- ☐ 14. ID Numbers (specify whether State or Federal).  
State Air Permit 26002/PSO-TX-888  
Federal Air Permit "Title V" 0-01200

## Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and listing of hazardous waste (40 CFR 261)
  - ☒ - Characteristic waste
  - ☐ - Listed waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - ☒ - Manifesting
  - ☒ - Pre-transport requirements
  - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - ☐ - Transfer facility requirements
  - ☐ - Manifest system and record-keeping
  - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - ☐ - General facility standards
  - ☐ - Preparedness and prevention
  - ☐ - Contingency plan and emergency procedures
  - ☐ - Manifest system, record-keeping, and reporting
  - ☐ - Groundwater protection
  - ☐ - Financial requirements
  - ☐ - Use and management of containers
  - ☐ - Tanks
  - ☐ - Waste piles
  - ☐ - Land treatment
  - ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)

Other (you must list these if applicable)

- ☐ 8. Federal, State, tribal, or local regulations not listed above
- ☐ 9. ID Numbers (specify whether State or Federal).  
State of Texas Solid Waste Registration Number 85082  
Federal EPA Identification Number TXR000021212

## Hazardous Materials Management

*Check all that apply.*

- ☒ 1. Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Underground Storage Tank Regulations (40 CFR 280-282)

*Other (you must list these if applicable)*

- ☐ 7. Federal, State, tribal, or local regulations not listed above.  
State of Texas Above Ground Petroleum Storage Tank Registration
- ☐ 8. ID Numbers (specify whether State or Federal).  
Facility Number 0072020, Owner ID No:53951

## Solid Waste Management

*Check all that apply.*

- ☒ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☒ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☒ 4. Solid Waste Storage and Removal Requirements
- ☐ 5. Disposal Requirements for Special Wastes

*Other (you must list these if applicable)*

- ☐ 6. Federal, State, tribal, or local regulations not listed above.
- ☐ 7. ID Numbers (specify whether State or Federal).

## Water Pollution Control Requirements

Check all that apply.

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)
- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☐ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)  
Name of POTW  
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☐ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other (you must list these if applicable)

- ☒ 17. Federal, State, tribal, or local regulations not listed above.  
State of Texasm TPDES Multi-Sector General Permit for Storm Water Pollution Prevention
- ☐ 18. ID Numbers (specify whether State or Federal).  
State of Texas ID No: TXR 05L091

## Drinking Water Regulations

*Check all that apply.*

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

*Other (you must list these if applicable)*

- ☐ 7. Federal, State, tribal, or local regulations not listed above.
- ☐ 8. ID Numbers (specify whether State or Federal).

## Toxic Substances

*Check all that apply.*

- ☐ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☐ 2. Import and Export of Chemicals (40 CFR 707)
- ☐ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☐ 4. Chemical Information Rules (40 CFR 712)
- ☐ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

*Other (you must list these if applicable)*

- ☐ 10. Federal, State, tribal, or local regulations not listed above.
- ☐ 11. ID Numbers (specify whether State or Federal).

## Pesticide Regulations

Check all that apply.

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

Other (you must list these if applicable)

- ☐ 9. Federal, State, tribal, or local regulations not listed above.
- ☐ 10. ID Numbers (specify whether State or Federal).

## Environmental Clean-Up, Restoration, Corrective Action

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). Please identify and include date of Record of Decision.
- ☐ 2. RCRA Corrective Action. Please provide date of RCRA/HSWA permits that require corrective action.
- ☐ 3. Other Federal, State, tribal, or local environmental clean-up, restoration, corrective action regulations not listed above. Please include date of requirement.

**Facility Name** Louisiana Pacific Carthage OSB Plant

**Facility Location:** 1199 County Road 201, Carthage, TX 75633



The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com).

To submit your application:

- 1) E-mail the completed application to [ptrack@indecon.com](mailto:ptrack@indecon.com),  
**and**
- 2) Fax the completed and signed Section E (**not** the entire application) to  
(617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140